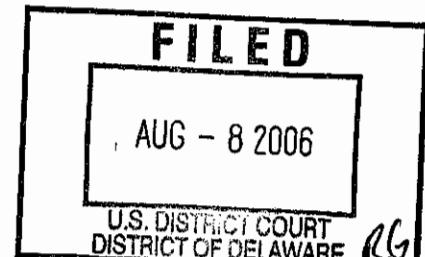


WILLIAM A. NEWSOM
SBI#257317
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

)
WILLIAM A. NEWSOM,)
PLAINTIFF,)
-v-)
COMMISSIONER STANLEY W. TAYLOR)
BUREAU CHIEF PAUL HOWARD,)
DEPUTY WARDEN DAVID PIERCE,)
CAPTAIN SAGERS, SECURITY)
SUPERINTENDENT CUNNINGHAM,)
FIRST CORRECTIONAL MEDICAL, LLC.,)
DR. SITTA B. ALIE,)
DEFENDANTS.)

C.A. No. 05-673(GMS)



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PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

(ATTORNEYS FOR FIRST CORRECTIONAL
MEDICAL, LLC.)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff hereby request that defendant's produce for inspection and copying, the documents and tangible things identified below within (30) calendar days of the service of this document request.

1. Any and all medical records and medical x-rays of plaintiff's finger in regards to this civil complaint from September 20, 2003 through and including the date of your response to this request.
2. Any and all policies, procedures, regulations, instructions, notes, memoranda, internal communications, electronic messages and directives in effect from September 20, 2003 through and including the date of your response to this request regarding the treatment of plaintiff's finger in regards to this civil complaint.

3. Any notes, documents, letters, memoranda, files, records, record books, logs, grievance reports, internal messages, electronic messages, directives or written communications concerning complaints made about or against Dr. Sitta B. Alie and First Correctional Medical,LLC.
4. Any and all certificates, degrees, credentials, and licenses held by Dr. Sitta B. Alie that describes what type of doctor she was, what she was professionally able to perform medically, and which shows that she was legally licensed to practice medicine in the state of Delaware in the United States.
5. Any and all documents, notes, memoranda, internal communications, electronic messages, contracts and directives that were issued from September 20, 2003 through and including the date of your response to this request concerning the termination of Dr.Sitta B. Alie's employment at the Delaware Correctional Center and with First Correctional Medical,LLC.
6. Any and all policies, procedures, regulations, instructions, and directives in effect from September 20, 2003 through and including the date of your response to this request concerning the screening and employing of any and all staff members of First Correctional Medical,LLC.
7. Any and all documents, agreements, regulations, policies, internal messages, electronic messages, procedures, contracts, and screening procedures from September 20, 2003 through and including the date of your response to this request concerning the Delaware Department of Corrections contracting the private medical company First Correctional Medical,LLC. to provide its services to inmates.
8. Any and all documents, letters , memoranda, internal messages, electronic messages, policies, procedures, and regulations in effect from September 20, 2003 through and including the date

of your response to this request concerning the Delaware Department of Corrections terminating its contract with First Correctional Medical, LLC.

9. Any and all policies, procedures, memoranda and directives in effect from September 20, 2003 through and including your response to this request concerning how First Correctional Medical, LLC. responds to the medical reports of outside doctors request for certain medical treatment of inmates sent to them by First Correctional Medical, LLC. specifically, the diagnosis and plan for treatment of the plaintiff dated October 17, 2003 by Dr. Stephen G. Manifold (see attached exhibit) that was sent to First Correctional Medical, LLC.

August 2, 2006

William A. Newsom

William A. Newsom

SBI# 257317

Delaware Correctional center
1181 Paddock Road
Smyrna, Delaware 19977

CERTIFICATE OF SERVICE

I, WILLIAM A. NEWSOM, HEREBY CERTIFY THAT A TRUE AND CORRECT COPY OF THIS MOTION FOR DISCOVERY HAS BEEN PROVIDED TO THE FOLLOWING PARTIES:

DANIEL L. MCKENNY, DEL. BAR NO. 2689
and
DANA SPRING MONZO, DEL. BAR NO. 4605
1225 N. KING ST., SUITE 1100
P.O. BOX 397
WILMINGTON, DELAWARE 19899
(ATTORNEYS FOR FIRST CORRECTIONAL MEDICAL, LLC.

AND

CLERK OF COURT
UNITED STATES DISTRICT COURTHOUSE
844 N. KING ST.
LOCKBOX 18
WILMINGTON, DELAWARE 19801

August 2, 2006

William A. Newsom
WILLIAM A. NEWSOM
SBI#257317
DELAWARE CORRECTIONAL CENTER
1181 Paddock Road
Smyrna, Delaware 19977